

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Evelyn E. Vanish

Debtor(s)

PENNSYLVANIA HOUSING FINANCE AGENCY

Movant

vs.

Evelyn E. Vanish

Respondent(s)

BK NO. 20-10777 MDC

Chapter 13

Hearing Date: 09/10/20

**OBJECTION OF PENNSYLVANIA HOUSING FINANCE AGENCY
TO CONFIRMATION OF CHAPTER 13 PLAN**

PENNSYLVANIA HOUSING FINANCE AGENCY (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. Secured Creditor intends to file a secured claim with pre-petition arrears estimated at \$9,598.02 prior to the confirmation hearing.
2. Debtor's Plan provides for payment in the amount of \$8,500.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$1,098.02, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, PENNSYLVANIA HOUSING FINANCE AGENCY, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: September 2, 2020

By: **/s/ Rebecca A. Solarz, Esquire**

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